

LM FOODS L.L.C.

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June 10, 1999

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Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Kane, Room 1061
Rockville, MD 20852

To Whom It May Concern:

RE: Disjunctive Labeling for Surimi Seafood

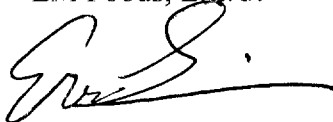
As a leading manufacturer of surimi seafood products, I feel compelled to send you this correspondence concerning "Disjunctive Labeling" when multiple species of surimi are utilized. During different times of the year, Pollock and Whiting availability fluctuates. In order for the basic survival of the industry, we need a degree of flexibility to adjust fish ingredients based upon availability. By accommodating this concept, we will not have to incur the exorbitant cost associated with labeling and packaging, in order to keep the product most affordable by consumers.

It is our intention to accurately reflect the contents of our product. We would like to propose the following option, which would be fair to the market (consumers and producers):

- It would be in the best interest of the industry to utilize Fish (may contain one or more of the following: Pollock, Whiting, and/or Cod) as this is what most of the world markets are currently utilizing for the labeling of surimi products.

Thank you for your anticipated cooperation.

Best regards,
LM Foods, L.L.C.



Eric Lin
Plant Manager

98P-0968

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